

ATTACHMENT A

STIPULATION OF FACTS

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

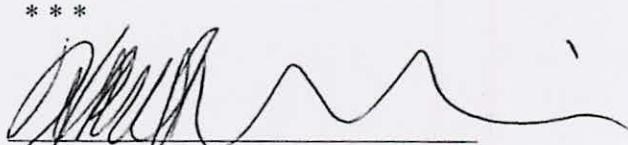
At all relevant times, the victim ("V-1") was a research entomologist for the Department of Agriculture, assigned to the Beltsville Agricultural Research Center ("BARC") located in Beltsville, Maryland. The Defendant, **KAMLESH CHAUHAN** ("CHAUHAN") was also a research entomologist at the same facility. Some time after they both started working at BARC in 2001, V-1 and **CHAUHAN** began working together, and **CHAUHAN** became the V-1's supervisor.

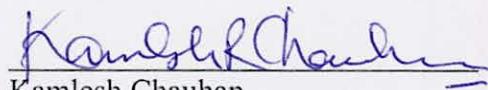
On multiple occasions, **CHAUHAN** kissed V-1 without V-1's consent, sometimes asking V-1 to come into his office and sometimes committing the actions in a laboratory. At other times, **CHAUHAN** kissed V-1's breast, placed his hand beneath V-1's clothing, and pushed V-1 against a wall where he kissed V-1 on the face, all without V-1's consent. V-1 repeatedly told **CHAUHAN** that V-1 did not want to have any such contact with him.

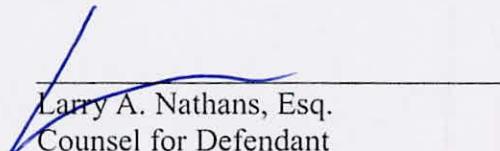
On March 30, 2018, V-1 was in **CHAUHAN**'s office. **CHAUHAN** told V-1 to stand up for a hug and tried to kiss V-1. **CHAUHAN** touched V-1's right breast and tried to remove V-1's shirt. V-1 pulled the shirt back down and left.

BARC is located on lands within the special maritime and territorial jurisdiction of the United States.

SO STIPULATED:


Hollis R. Weisman
Assistant United States Attorney


Kamlesh Chauhan
Defendant


Larry A. Nathans, Esq.
Counsel for Defendant

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